

**From:** [Moore, Gary](#)  
**To:** [Porter, Gary](#)  
**Subject:** Fwd: CES  
**Date:** Thursday, October 09, 2014 11:51:45 PM  
**Attachments:** [image002.jpg](#)

---

Gary

See

Message blow from TCEQ Attorney. Do you know anything about Citgo or other refinery involvement with CES?

Gary Moore

Sent from my iPhone

Begin forwarded message:

**From:** Patricia Scott <[patricia.scott@tceq.texas.gov](mailto:patricia.scott@tceq.texas.gov)>  
**Date:** October 9, 2014 at 4:17:09 PM CDT  
**To:** "Moore, Gary" <[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>, "Salinas, Amy" <[salinas.amy@epa.gov](mailto:salinas.amy@epa.gov)>  
**Cc:** "Werner, Robert" <[Werner.Robert@epa.gov](mailto:Werner.Robert@epa.gov)>  
**Subject:** RE: CES

Hi Gary,

Citgo had a contractual relationship with CES where CES would take waste caustic from the refinery and the "recycle it" by selling it to the paper mills. Sometimes they took the caustic to PACES, CES's subcontractor and may have slightly adjusted the solution. This is the type of material that TCEQ removed from the tank trailers at PACES. The waste characterization analysis of tank 604 is very similar to waste in most of the tank trailers at PACES. CES had several similar contractual relationships with other refineries. I haven't been able to locate any manifest that indicates how the waste got from PACES to CES. I don't know which refinery it came from. I hoping that EPA's CID investigation records has this information.

*Patricia J. Scott*

Staff Attorney, TCEQ, Office of Legal Services, Litigation Division,  
MC-175 P.O. Box 13087  
Austin, Texas 78711-3087  
Tel: (512) 239-0637  
Fax: (512) 239-3434

[Patricia.Scott@tceq.texas.gov](mailto:Patricia.Scott@tceq.texas.gov)

IF THIS E-MAIL IS BEING SENT WITHIN THE COMMISSION IT IS MEANT TO BE  
CONFIDENTIAL/ATTORNEY-CLIENT DOCUMENT/ATTORNEY WORK PRODUCT.  
DO NOT RELEASE OUTSIDE OF THE COMMISSION EXCEPT WITH THE EXPRESS  
PERMISSION OF THE  
OFFICE OF LEGAL SERVICES

---

**From:** Moore, Gary [<mailto:Moore.Gary@epa.gov>]  
**Sent:** Wednesday, October 08, 2014 5:22 PM  
**To:** Patricia Scott; Salinas, Amy  
**Cc:** Werner, Robert

**Subject:** Fw: CES

**Hello All:**

The below email is from a former employee of CES that now works for an Environmental Company. He has been very helpful. I am sending this to you because he indicated Citgo Caustic and I am not sure we have located anything associated with Citgo. We may want to scour our records to see how they may or may not be involved.

Thanks

**Gary Moore**

**Federal On-Scene Coordinator**

**U.S. EPA Region 6**

**214-789-1627 cell**

**214-665-6609 office**

**[moore.gary@epa.gov](mailto:moore.gary@epa.gov)**

---

**From:** [gary@c4env.com](mailto:gary@c4env.com) <[gary@c4env.com](mailto:gary@c4env.com)>

**Sent:** Wednesday, October 8, 2014 3:02 PM

**To:** Moore, Gary; Mickey Edmondson

**Subject:** RE: CES

Hello Gary:

These results are not surprising for what we know is in the boxes. It is not consistent with that of the Houston facility that only processed non-haz and oily water. It my understanding that these boxes came from the Port Arthur plant as either Citgo's caustic or waste derived from the processing of the Citgo waste.

Thank You,

Gary Brauckman



281-686-3352

----- Original Message -----

Subject: CES

From: "Moore, Gary" <[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>

Date: Wed, October 08, 2014 12:44 pm

To: Mickey Edmondson <[environmental@usa.com](mailto:environmental@usa.com)>, "Gary Brauckman ([gary@c4env.com](mailto:gary@c4env.com))" <[gary@c4env.com](mailto:gary@c4env.com)>

**Mickey/Gary:**

Veolia got samples of each of the vac boxes and we are going to get hit significant surcharges for sulfur and sodium. These are their comments. Is this surprising to you based upon the operation of the facility?

**Below is an update on the analysis.**

**Organic Liquid / VB633 - 3.3% sulfur and 6.5% sodium.**

**Organic Sludge, Flammable / VB639 - 4.3% sulfur and 3.34% sodium.**

**Organic Sludge / multiple boxes as follows:**

**VB25141 - 69.7% sulfur (rerun is 71.2% sulfur) and 0.9% Sodium.**

**VB281842 - 65.1% sulfur (rerun is 48.6%) and 0.7% sodium.**

**VB640 - 42.8% sulfur (rerun is 48.6%) and 1.45% sodium.**

**VB610 - 17.6 ppm Mercury.**

**VB618 - 3.18% sodium.**

**Gary Moore**

**Federal On-Scene Coordinator**

**U.S. EPA Region 6**

**214-789-1627 cell**

**214-665-6609 office**

**[moore.gary@epa.gov](mailto:moore.gary@epa.gov)**